

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re	Chapter 11
FTX TRADING LTD., <i>et al.</i> , ¹	Case No. 22-11068 (JTD)
Debtors.	(Jointly Administered)
ALAMEDA RESEARCH LLC, ALAMEDA RESEARCH LTD., FTX TRADING LTD., WEST REALM SHIRES, INC., and WEST REALM SHIRES SERVICES, INC.,	
Plaintiffs,	
-against-	Adv. Pro. No. 23-50145 (JTD)
FTX DIGITAL MARKETS LTD., BRIAN C. SIMMS, KEVIN G. CAMBRIDGE, and PETER GREAVES, and J. DOES 1–20	Re: Adv. Docket Nos. 1, 4, 6 & 11
Defendants.	

CERTIFICATION OF COUNSEL

I, Matthew B. McGuire, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On March 19, 2023, Alameda Research LLC, Alameda Research Ltd., FTX Trading Ltd., West Realm Shires, Inc., and West Realm Shires Services, Inc. (collectively, the “Plaintiffs”) commenced the above-captioned adversary proceeding (the “Adversary

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

Proceeding”), pending in the United States Bankruptcy Court for the District of Delaware (the “Court”) by filing the *Complaint* [Adv. Docket No. 1] (the “Complaint”) against FTX Digital Markets, Ltd. (“Digital”), Brian C. Simms KC, Kevin G. Cambridge and Peter Greaves, the Joint Provisional Liquidators and Foreign Representatives of FTX DM (the “JPLs” and, together with Digital, the “JPL Defendants,” and together with the Plaintiffs, the “Parties”).

2. On April 21, 2023, the Parties entered into that certain *Stipulation Between the Parties to Extend the JPL Defendants’ Deadline to Answer or Otherwise Respond to the Complaint* [Adv. Docket No. 4], which extended the JPL Defendants’ deadline to answer or otherwise respond to the Complaint to May 8, 2023.

3. On May 8, 2023, the JPL Defendants filed the *Motion of FTX Digital Markets Ltd. and the Joint Provisional Liquidators to Dismiss the Complaint or, in the Alternative, to Abstain from Ruling on Counts I-IV* [Adv. Docket No. 6] (the “Motion to Dismiss”).

4. On May 23, 2023, the Court entered an order approving the *Stipulation Between the Parties Regarding Briefing Deadlines for the JPL Defendants’ Motion to Dismiss* [D.I. 11], which (i) extended the deadline for the Plaintiffs to file a response to the Motion to Dismiss amend their complaint as a matter of course pursuant to Fed. R. Bankr. P. 7015 and Fed. R. Civ. P. on or prior to June 14, 2023, and (ii) set the deadline for Defendants to file a reply in support of their Motion to Dismiss or answer or move with respect to the amended complaint on or prior to July 10, 2023.

5. The Parties have conferred and agreed to a proposed scheduling order governing the Adversary Proceeding.

6. The Parties’ stipulation is attached as Exhibit A to the proposed form of order approving the stipulation, which is annexed hereto as Exhibit 1 (the “Order”).

7. Accordingly, the Parties respectfully request that the Bankruptcy Court enter the Order at its earliest convenience.

Dated: June 12, 2023
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew B. McGuire
Adam G. Landis (No. 3407)
Matthew B. McGuire (No. 4366)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
mcguire@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

*Counsel for the Debtors
and Debtors-in-Possession*